ACKNOWLEDGEMENT AND RECORD OF SPCC INSPECTION AND PLAN REVIEW BULK STORAGE FACILITIES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 6

1445 Ross Avenue, 6 SF-PO, Dallas, Texas 75202-2733

SPCC Case #: FY-INSP-090178	FRP ID: FRP-06-AR-00053	<u> </u>	
SPCC Inspection Date: 8/24/2009 Time: 9:00 AM	FRP Inspection Date: 8/24/2009	Time: 9:00 AM	
Name of Facility: <u>Ft. Smith Terminal</u>			
Latitude: <u>N 35°18' 34"</u> Longitude: <u>W 94°23</u>	<u>'' 38"</u> Source: <u>FRP</u>		
Facility Address/Location: <u>8101 Highway 71 South</u>			
☐ Tribal Land Reservation Name:			
City: <u>Ft. Smith</u> County/Parish: <u>Seba</u>	stian State: <u>AR</u> Zip	: <u>72903</u>	
Facility Contact: <u>Douglas Hammer</u>	_Title: <u>Supervisor Operation & Mana</u>	<u>gement</u>	
Telephone Number: <u>479-646-1721</u>	_Email: <u>doug.hammer@magellanlp.c</u>	<u>om</u>	
Name of ⊠ Owner/⊠ Operator: <u>Magellan Pipeline Co</u>	mpany, LP		
Address: One Williams Center - P.O. Box 2186			
City: Tulsa	State: OK Zip: 74121-2186		
Contact: Terri Stillwell	_Title: <i>Environmental Manager</i>		
Telephone Number: <u>918-574-7310</u>	_Email: <u>Terri.stilwell@magellanlp.cor</u>	<u>n</u>	
Synopsis of Business: Storage and distribution of refine	ed petroleum products		
How many employees work at this facility?		NAICS #:	
If unmanned, how many employees maintain this facility	?		
Is the Facility: ☐ Unattended ☐ Attended(☐ Daily (8 hr)	□ Daily (24 hr) □ Periodically)		
Route of Entry to Waterway: Northwest to Mill Creek; N	North to Arkansas River		
Distance to waterway (in feet):	_		
Relative direction to water body: Northwest	Elevation above water body (ft):		
SPCC inspector name: Tom McKay	FRP inspector name: Don Smith		
Team members: Don Smith; Mike Clonts	Team members: Tom McKay; Mike Clonts		
SPCC Plan review by: Tom McKay	FRP review by: Mike Clonts		
Date of review: 8/1/2009	Date of review: 6/19/2009		
Acknowledgement of Inspection			
Company Contact: Doug Hammer	Title: Supervisor Operations and	Management	
Inspector: Tom McKay	Title: Inspector EPA/SEE		

Memorandum Of Understanding (check all applicable descriptions)			
Non-Transportation Related Transportation Related			
□ EPA	USCG MMS OPS		
	cility Type		
Onshore Oil:	Offshore Oil:		
☐ Production ☐ Drilling/workover	☐ Drilling, Production and Workover		
	□ Petroleum Distributor □ Service Station ☑ Petroleum Marketing Terminal □ Transporter (Truck/Rail) □ Pipeline Bulk Storage □ Tribal □ Railroad □ Utilities □ Remediation/Recycling □ State □ Refinery □ Local □ Rental Car Company □ Other: □ Sand & Gravel facility □ School/University Storage Containers pplicable descriptions)		
☑ Aboveground Storage Tanks ☐ Underground Storage Tanks ☑ Drums ☑ In-plant piping ☐ Other containers ☐ Mobile/portable storage Units ☐ Surface impoundments ☐ Lagoons ☐ Equipment			
Store	age Eurotion		
	age Function pplicable descriptions)		
☐ Transferring ☐ Distributing ☐ Processing	☐ Gathering ☐ Consuming/Using ☐ Operations		
Facility St	torage Capacities		
AST Storage Capacity (gal): UST Storage Capacity (gal): 0.0	pacity (gal): Total Facility Capacity (gal): 8,329,719		
Types of Oil Stored: ☐ Crude oil ☐ Gasoline ☐ Diesel ☐ Fuel oil ☐ Jet fuel ☐ Vegetable oil/animal fats, grease ☐ Other: <u>Distillates</u> , <u>Additives</u> , <u>Water/Oil</u>			
Qualified Facility Thresholds : ☐ <5,000 Gallons ☐ YES ☒ NO			
The aggregate aboveground storage capacity is 10,000 Gallons or less 112.3(g)(1) AND ☐ YES ☒ NO			
The facility has had no single discharge exceeding 1,000 U. S. gallons, and the facility has had no two discharges exceeding 42 U.S. gallons within any twelve-month period in the tree years prior to the SPCC Plan self-certification date, or since becoming subject to the rule if the facility has been in operation for less than three years. (Note: Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this qualification determination.) 112.3(g)(2)			
Is the facility considered a Qualified Facility? If YES to both questions above, <u>AND</u> the owner/operator has self			

GENERAL APPLICABILITY - 40 CFR 112.1
Does the facility maintain an aggregate aboveground oil storage capacity of over 1,320 gallons, and/or completely buried oil
storage capacity of over 42,000 gallons?
YES □ NO
and
Is the facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or
consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the
navigable waters of the United States (as defined in 40 CFR 110.1)?
Ĭ YES ☐ NO
If YES to both, the facility is regulated under 40 CFR 112.
Note: The following storage capacity is not considered in determining applicability of SPCC requirements:
- Completely buried tanks subject to all the technical requirements of 40 CFR 280 or a state program approved under 40 CFR 281.
- Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management
Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993.
- Any facility or part thereof used exclusively for wastewater treatment and not used to satisfy SPCC requirements.
- Containers smaller than 55 gallons.
- Permanently closed containers.

FACILITY RESPONSE PLAN (FRP) APPLICABILITY		
Does the facility transfer oil over water to or from vessels and has a total oil storage carequal to 42,000 gallons?	apacity greater than or	☐ YES ☒ NO
Or, Does the facility have a total oil storage capacity of at least 1 million gallons, And, at least one of the following is true:		⊠ YES □ NO
The facility does not have secondary containment sufficiently large enough to conta largest aboveground tank plus sufficient freeboard for precipitation.	ain the capacity of the	☐ YES ☒ NO
The facility is located at a distance such that a discharge could cause injury to fish sensitive environments.	and wildlife and	⊠ YES □ NO
The facility is located such that a discharge would shut down a public drinking water	er intake.	☐ YES ☒ NO
The facility has had a reportable discharge greater than or equal to 10,000 gallons	in the past 5 years.	☐ YES ☒ NO
If YES to any of the above, the facility is a non-transportation related onshore facility r implement a FRP as outlined in 40 CFR 112.20.	equired to prepare and	
Does the facility maintain a FRP? ⊠ YES □ NO □ Not Required FRP N	Number: FRP-06-AR-000	53
Does the Plan include a signed copy of the Certification of the Applicability of the Subper 40 CFR Part 112.20(e)? Attachment C-II	stantial Harm Criteria	⊠ YES □ NO
Comment:		

REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC Plan – 40 CFR 112.3			
Facility Startup Date:	Date of initial SPCC Plan	preparation:	Current Plan version (date/number): _6/13/2003
For facilities (excluding farms) in op 112.3(a) YES NO NA	eration prior to August 16, 2	2002, was the P	Plan amended and implemented by July 1, 2009?
For facilities (excluding farms) begin implemented by July 1, 2009? 112.			and July 1, 2009, is the Plan prepared and fully
For facilities beginning operation aft	er July 1, 2009, was the Pla	n implemented	before beginning operations? 112.3(b) & (c)
Is an SPCC Plan prepared? X YI	ES NO N/A		
Professional Engineer certification r	nust include statements that	t the PE attests	to. 112.3(d)
He/she is familiar with the requirement	ents of the SPCC rule. (i)	⊠ YES □	NO 🗌 N/A
He/she or his/her agent has visited	and examined the facility. (i	ii) 🛚 YES	□ NO □ N/A
The Plan has been prepared in accordances, and with the requiremen			cluding consideration of applicable industry NO N/A
Procedures for required inspections	and testing have been esta	blished(iv)	YES □ NO ☒ N/A
The Plan is adequate for the facility	. (v) YES NO	⊠ N/A	
Is the SPCC Plan fully PE certified?	112.3(d) XES I	NO Date o	of Certification: 6/13/2003
Name of Professional Engineer: <u>F</u> License Number: <u>6982</u>	Robert D. Sholl State: <u>AR</u>		
la an CDCC Plan available for review		In an CDCC I	Non-maintained an aite?
Is an SPCC Plan available for revie (During normal working hours) 112.			Plan maintained on site? YES NO hours/day, excluding oil production facilities)
AMENDMENT OF SPCC PLAN	BY REGIONAL ADMIN	STRATOR (F	RA)—40 CFR 112.4
Have there been reportable spills at	this facility of more than 1,0	000 gallons? 11	(2.4(a)
Or, has the facility had two spills of	•	_	
If YES to either, was information submitted to the RA as required in §112.4(a)? ☐ YES ☐ NO ☒ N/A			
Date of spills: If applicable, have changes required by the RA been implemented in the Plan and/or facility? 112.4(d), (e)			
☐ YES ☐ NO ☒ N/A			
Comment:			

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
Has there been any change of facility design (construction, operation, or maintenance) that could affect the facility's potential for discharge? (112.5a) YES NO NA		
If YES, was the amendment within 6 months and was a plan change Yes	No or a design chan	ge 🗌 Yes 📗 No
Is the SPCC Plan reviewed and evaluated every 5 years? YES NO If amended and implemented (if necessary), is it documented in the Plan (sign off Date of latest change: Certification #:		ES NO N/A
Name of PE certifying amendments 112.5(c) (Except for self certified Plans): License #: State: Date of Certification:		
Reason for amendment: Comment:		
GENERAL REQUIREMENTS FOR SPCC PLANS 112.7(a-d)	Plan Review	Field Verification
Does the SPCC Plan indicate (by signature and date) that management has approved the plan? 112.7	☑ YES ☐ NO ☐ N/A	
Mgmt Personnel Name: <u>Doug Hammer.</u>		
Mgmt Personnel Title: <u>Supervisor Operations and Maintenance.</u>		
Does the Plan format follow the sequence in the rule? 112.7 or	☐ YES ☒ NO ☐ N/A	
If no, is a cross-reference provided?	☑ YES ☐ NO ☐ N/A	
Does the Plan call for additional facilities or procedures, methods, or equipment not yet fully operational?	☐ YES ☐ NO ☒ N/A	
If yes, are the following items discussed in the Plan?		
	☐ YES ☐ NO ☒ N/A	
☐ Installation ☐ Start-up	☐ YES ☐ NO ☒ N/A	
Does the Plan include a discussion of conformance with SPCC requirements?	☐ YES ☐ NO ☒ N/A ☐ YES ☐ NO ☐ N/A	
Does the Plan include a discussion of conformance with SPCC requirements?		

Written documentation validating/explaining rational for non-conformance

Written documentation outlining/detailing the alternative method/how it

with the SPCC requirements? and

Does the Plan contain a facility diagram? 112.7(a)(3)

achieves environmental equivalence?

 $\hfill \square$ YES $\hfill \square$ NO $\hfill \square$ N/A

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

☐ YES ☐ NO ☒ N/A

Does the diagram include:		
- The location and contents of each container?, and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Completely buried storage tanks?, and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Transfer stations?, and	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Connecting pipes?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is there a description in the Plan of the physical layout of the facility and includes: 112.7(a)(3)	⊠ YES □ NO □ N/A	
- The type of oil in each container and its storage capacity? 112.7(a)(3)(i)	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
 Discharge prevention measures including procedures for routine handling of products? 112.7(a)(3)(ii) 	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge? 112.7(a)(3)(iii) 	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 Countermeasures for discharge discovery, response, and cleanup (including facility and contractor resources)? 112.7(a)(3)(iv 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
 Methods for disposal of recovered materials in accordance with applicable legal requirements? 112.7(a)(3)(v) 	☐ YES ☐ NO ☒ N/A	
 Contact list and phone numbers for the facility response coordinator, NRC, cleanup contractors, and federal, state, and local agencies who must be notified in the case of a discharge as described in §112.1(b)? 112.7(a)(3)(vi) 	☐ YES ☐ NO ☒ N/A	
Does the Plan include information and procedures for reporting a discharge (exact location, phone number, date/time of material discharged, quantity, actions taken, evacuations, notifications,(names/organizations etc.)? 112.7(a)(4)	☑ YES ☐ NO ☐ N/A	
Does the Plan include procedures to use when a discharge may occur? 112.7(a)(5)	⊠ YES □ NO □ N/A	
Does the Plan include a prediction and description of major equipment failure(s) that could result in a discharge from the facility per 40 CFR 112.7(b)?	⊠ YES □ NO □ N/A	
$oxed{\boxtimes}$ direction, $oxed{\boxtimes}$ rate of flow, and $oxed{\boxtimes}$ total quantity of oil		
Does the Plan discuss appropriate containment and/or diversionary structures/equipment (dikes, berms, retaining walls, curbing, culverts, gutters/drain systems, weirs, boom, diversion/retention ponds, sorbent material) and is sufficiently impervious to contain oil. per 40 CFR 112.7(c)	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Has it been determined in the Plan, that the installation of structures or equipment (containment) is not practicable ?? 112.7(d) If YES, check ☐ then 40 CFR Part 109 Checklist must be filled out and,	□YES □NO 図N/A	
- Is the impracticability clearly demonstrated?	☐ YES ☐ NO ☒ N/A	
 For bulk storage containers, is periodic integrity testing of containers and leak testing of the valves and piping associated with the container conducted? 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Is a strong contingency plan per 40 CFR 109 provided? 112.7(d)(1)	☐ YES ☐ NO ☒ N/A	
 Is a written commitment of manpower, equipment, and material (to control and remove any quantity of oil discharged) provided in the SPCC plan? 112.7(d)(2 	□YES □ NO ☒ N/A	

INSPECTIONS, TESTS, AND RECORDS 112.7(e)	Plan Review	Field Verification
Are inspections and tests required by 40 CFR 112 conducted in accordance with written procedures developed for the facility? 112.7(e)	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
If Yes, are written procedures, records of inspections and/or customary business records:		
- Signed by the appropriate supervisor or inspector?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Kept with the SPCC Plan?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- Maintained for a period of three (3) years?	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Comment:		

Comment:

PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES 112.7 (f)	Plan Review	Field Verification
Are oil handling personnel trained on: 112.7(f)(1)		
The operation and maintenance of equipment to prevent the discharge of oil?	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
- Discharge procedure protocols (discovery and notification)?	⊠ YES □ NO □ N/A	⊠YES □ NO □ N/A
- Applicable pollution control laws, rules, and regulations?	☐ YES ☑ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- General facility operations?	☐ YES ☑ NO ☐ N/A	NO □ N/A
- The contents of the Plan?	⊠ YES □ NO □ N/A	⊠YES □ NO □ N/A
Is there a designated person accountable for spill prevention? 112.7(f)(2)	☐ YES ☑ NO ☐ N/A	⊠ YES □ NO □ N/A
Name and title of individual? Craig Doty (no longer at facility)		
Are spill prevention briefings scheduled periodically? 112.7(f)(3)	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
What is the schedule (minimum at least once a year)?		
☐ Monthly ☐ Quarterly ☐ Semi-annually ☒ Annual		

The SPCC plan did not contain all of the requisite training protocols for oil-h individual named as responsible for spill prevention at the facility, but insperiacility. Please identify and denote the responsible individual in the plan. The "No" are not addressed, inadequately addressed, or not located in the plan a	ction verified that he e inspection checklist	no longer is at the t boxes marked
SECURITY (excluding oil production facilities) 112.7(g)	Plan Review	Field Verification
Environmental Equivalence		
Qualified Facility [(If the facility is a "qualified facility", complete section 112.7(k) and Appendix A of this checklist.)		
Is the facility fully fenced and are entrance gates locked and/or guarded when not in production or unattended? 112.7(g)(1) EE \square QF \square	⊠ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are master flow and drain valves that permit direct outward flow to the surface secured in closed position when in a non-operating or standby status? 112.7(g)(2	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
EE □ QF □		
Are starter controls on pumps locked in the "off" position or located at a site accessible only to authorized personnel when in non-operating or standby status? 112.7(g)(3) $EE \ \square \ QF \ \square$	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
Are transfers at loading/unloading (facility pipeline/piping) connections securely capped or blank-flanged when not in service or standby status? 112.7(g)(4)	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
EE □ QF □		
Does the facility lighting appear to be adequate (commensurate with the type/location of the facility) to facilitate the discovery of spills during hours of darkness and to deter vandalism? 112.7(g)(5) EE \square QF \square	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
Comment:		

Comment:

FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK, (excluding offshore facilities) 112.7(h-j)	Plan Review	Field Verification
Environmental Equivalence		
Does the facility have a loading/unloading/transfer area? If yes,	⊠ YES □ NO □ N/A	☑YES ☐ NO ☐ N/A
 Does the facility have containment consistent with 112.7(c) as required by 112.1(a)(1) to prevent a discharge of oil to the waters of the U.S.? 	⊠ YES □ NO □N/A	⊠ YES □ NO □ N/A
Does drainage from loading/unloading areas and/or locations adjacent to the loading or unloading racks flow to catchment basin(s), or	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
- Treatment system? 112.7(h)(1)	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
- If NO to either, is quick drainage system used?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Are containment systems designed to hold at least the maximum capacity of any largest single compartment of a tank car or tank truck (when at the loading/unloading rack)?	⊠ YES □ NO □ N/A	☐ YES ☐ NO ☒ N/A
Is there a system used to prevent departure (tank trucks/tank cars) before completing the disconnection from transfer lines? 112.7(h)(2) EE	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
If YES, are there:		
- Interlocked warning lights? or ,	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
- Physical barrier systems (i.e., wheel locks)? or ,	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Warning signs? or ,	☑YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
- Vehicle brake interlock system?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Are tank cars/tank trucks lower most drains and all outlets inspected for discharges prior to filling and departure? $112.7(h)(3)$, (note; do procedures ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit)	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
EE 🗆		
Comment		
It should be noted that the facility loading rack containment consists underground oil/water separator with a capacity of 8,000 gallons. This overall storage capacity for the facility nor is it considered an undergois not oil storage. However, the plan should contain a description expression with secondary containment provisions and how it is operative SPCC plan accordingly.	s container does no ground storage con plaining how on oil	ot count toward tainer as its intent /water separator

Does the Plan include a risk analysis and/or evaluation of field-constructed aboveground tanks for brittle fracture after tank repair/alteration/ or when a change in service has occurred? 112.7(i)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Comment		
Does the Plan include a discussion of conformance with applicable requirements of the SPCC rule or any applicable state rules, regulations, and guidelines <i>and</i> other effective discharge prevention and containment procedures listed in 40 CFR Part 112? 112.7(j)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Comment		
QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT SECONDARY CONTAINMENT OPTION 112.7(k)	Plan Review	Field Verification
Is there qualified oil-filled operational equipment at the facility? (Oil storage containers and associated piping intrinsic to the operation of the equipment in which the oil is present solely to support the function of the apparatus or the device.) Has the facility qualified for the secondary containment option? 112.7(k)	□YES □NO 図N/A	□YES □ NO 図 N/A
 Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date? 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
 Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date? 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
If YES for either, secondary containment is required. See 112.7(c).		
If NO and no secondary containment is provided, then:		
- Are facility procedures for inspections/monitoring program established and documented? 112.7(k) (2)(i)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Does the facility maintain a Facility Response Plan? 112.7(k) (2)(ii)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Is there a Contingency plan following 40 CFR part 109 (see Appendix D checklist) provided? AND	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is there a written commitment of manpower, equipment, and materials required to control and remove any quantity of oil discharged that may be harmful?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A

Comment		
FACILITY DRAINAGE 112.8(b)	Plan Review	Field Verification
Environmental Equivalence		
Is drainage from diked storage areas restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system? 112.8(b)(1) EE	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
- If YES, is the facility designed to control such discharge?	⊠ YES □ NO □ N/A	⊠YES □NO □N/A
Is drainage from diked storage areas that drain directly into a watercourse, restrained via manual, open-and-closed designed valves? 112.8(b)(2) If YES,	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
EE 🗆		
- Is runoff rainwater from diked areas inspected such, that it will not cause a harmful discharge (as defined in 40 CFR 110)? 112.8(c)(3)(ii)	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
- Are valves opened and resealed under responsible supervision? 112.8(c)(3)(iii)	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 Are adequate records (or NPDES permit records) of dike drainage events maintained? 112.8(c)(3)(iv) 	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
Does drainage from undiked areas flow into catchment basins, ponds, or lagoons designed to retain oil or return it to the facility? 112.8(b)(3) EE	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 If YES, is the catchment basin located in areas not subject to periodic flooding? 	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
- If NO, for the final discharge of all ditches inside the facility, is there a diversion system to retain spills in the facility? 112.8(b)(4)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is drainage water continuously treated in more than one treatment unit in the facility? 112.8(b)(5) EE	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- If Yes, are two "lift" pumps provided of which one is permanently installed or is the drainage system engineered to prevent a discharge in case of equipment failure or human error?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Comment:	<u> </u>	

BULK STORAGE CONTAINERS 112.8(c) (See Container Inspection Forms)	Plan Review	Field Verification
Environmental Equivalence		
Qualified Facility ☐ (If the facility is a "qualified facility", complete section 112.7(k) and Appendix A of this checklist.)		
Is the material and construction of containers compatible to the oil stored and to the conditions of storage such as pressure and temperature, etc.? $112.8(c)(1)$	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
EE 🗆		
Do all container installations have secondary containment (Note: drainage trench enclosures that terminate to a facility catchment basin or holding pond may be used)? $112.8(c)(2)$ If Yes,	☑ YES ☐ NO ☐ N/A	⊠ YES □ NO □ N/A
(Can not use Environmental Equivalence for this part)		
 Will the containment(s) hold the capacity of the largest single container plus sufficient freeboard for precipitation? 	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 Are containment systems, including walls and floors, sufficiently impervious to contain discharged oil? 	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
Is there drainage of uncontaminated rainwater from diked areas into a storm drain or open watercourse? If YES,	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
- Are bypass valves on diked areas sealed closed when not draining uncontaminated rainwater? 112.8(c)(3)(i)	⊠ YES □ NO □ N/A	⊠YES □ NO □ N/A
- Is retained rainwater inspected to ensure that its presence will not cause a discharge as described in §112.1(b)? 112.8(c)(3)(ii)	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
- Are bypass valve opened and resealed under responsible supervision? 112.8(c)(3)(iii) EE	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
- Are adequate records of drainage maintained? 112.8(c)(3)(iv)	⊠YES □NO □N/A	☑YES ☐ NO ☐ N/A
Are there completely buried metal storage tanks at the facility? 112.8(c)(4) EE	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☑ N/A
 If YES, are they regulated under 40 CFR part 280 or state program approved under 40 CFR part 281? 112.1(d)(2)(i) If NO, 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
 Were they installed after January 10, 1974, are tanks protected from corrosion (compatible with soil conditions)? and, 	☐ YES ☐ NO ☒ N/A	□YES □NO 図N/A
- Are tanks subject to regular leak testing?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Are there partially buried containers at the facility? 112.8(c)(5) EE	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
 If YES, are buried sections protected from corrosion (compatible with local soil conditions)? 	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Does the Plan indicate that visual inspections of the outside of tanks are performed? 112.8(c)(6) and, EE	⊠ YES □ NO □ N/A	⊠YES □ NO □ N/A

	this facility subject to periodic integrity testing, or other shell testing (by qualified personnel) whenever ? $112.8(c)(6)$		☐ YES ☐ NO ☒ N/A
What type(s) and frequence	cy of test?:		
- Hydrostatic?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Magnetic Particle?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Penetrant-dye?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Ultrasonic?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Radiographic?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Acoustic Emissions?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Laser?, or	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Other?	☐ Monthly ☐ Bi-annual ☐ Annual ☐ 5 yr ☐ 10 yr ☐ 15 yr	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Describe:		-	
Are comparison records of container/tank inspections (or customary business records/tests) maintained? 112.8(c)(6) $EE \square QF$		☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
If YES, do the records indicate that inspection are conducted on:			
- Tank supports and	foundations?	⊠ YES □ NO □ N/A	☑YES ☐ NO ☐ N/A
- Signs of deteriora	tion?	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
- Discharges?		⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
- Accumulation of oi	I inside diked areas?	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
Are internal heating coils u	utilized? 112.8(c)(7) If YES, EE	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Do steam return/exha	ust lines discharge into open watercourse?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
	ust discharging into an open watercourse monitored or ling tank, skimmer, or other separation or retention	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is each containers' installa engineering practice? 112.	ation engineered or updated in accordance with good $B(c)(8)$	⊠ YES □ NO □ N/A	☑ YES ☐ NO ☐ N/A
(One or more of the follow	ving must be utilized.)		
- Do tanks have audible	e or visual high liquid level alarms? 112.8(c)(8)(i), or	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
- High liquid level pump	cutoff devices? 112.8(c)(8)(ii), or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A

 Audible or code signal communications between gauger and pumping station? 112.8(c)(8)(iii), or 	□YES □NO 図N/A	☐ YES ☐ NO ☒ N/A
 A system of determining liquid level in containers such as digital computers, telepulse, or direct vision gauges? 112.8(c)(8)(iv) 	☑YES ☐ NO ☐ N/A	☑YES ☐ NO ☐ N/A
Are liquid level sensing devices regularly tested? 112.8(c)(8)(v)	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Are effluent treatment facilities observed frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b)? 112.8(c)(9) EE	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Are visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed? 112.8(c)(10))	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
EE 🗆		
Are there mobile or portable storage units at this facility? 112.8(c)(11) If YES,	☑YES ☐ NO ☐ N/A	⊠YES □ NO □ N/A
 Are storage containers positioned to prevent discharged oil from reaching navigable water? 	☑YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
 Is there adequate secondary means of containment with sufficient capacity to contain the largest single compartment or container and sufficient freeboard for precipitation provided? 	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Comment:		
FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS112.8(d)	Plan Review	Field Verification

FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS112.8(d)	Plan Review	Field Verification
Environmental Equivalence		
Are buried piping corrosion protected with protective wrapping and/or coating? (Must be corrosion protected on or after August 16, 2002) 112.8(d)(1), or EE	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
 Corrosion protected under part 280 or state program approved under part 281? 112.1(d)(2)(i) 	☐ YES ☐ NO N/A	☐ YES ☐ NO ☒ N/A
Are sections of exposed buried piping inspected for deterioration, and appropriate corrective action taken as needed?	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Are not-in-service or standby (extended time) piping, capped and blank-flanged, and marked as to their origin? 112.8(d)(2) EE	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
Are pipe supports designed to minimize abrasion and corrosion, and to allow for expansion and contraction? $112.8(d)(3)$	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A

Are aboveground valves, piping and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces inspected regularly? 112.8(d)(4) EE	⊠ YES □ NO □ N/A	☑YES ☐ NO ☐ N/A
At what frequency?:		
- Daily, or	⊠ YES □ NO □ N/A	☑YES ☐ NO ☐ N/A
- Weekly, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Monthly, or	☑ YES ☐ NO ☐ N/A	⊠YES □ NO □ N/A
- Bi-monthly, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Annual, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Semi-annual, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Other	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
Is periodic integrity and leak testing of buried piping (at the time of installation, modification, construction, relocation, or replacement) conducted? 112.8(d)(4)	⊠ YES □ NO □ N/A	⊠ YES □ NO □ N/A
EE 🗆		
At what frequency?:		
- Daily, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Weekly, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Monthly, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Annual, or	☐ YES ☐ NO ☒ N/A	☐ YES ☐ NO ☒ N/A
- Other <u>Upon modification</u>	☑ YES ☐ NO ☐ N/A	⊠YES □ NO □ N/A
Is vehicle traffic warned of aboveground piping or other oil transfer operations? 112.8(d)(5) EE	☑ YES ☐ NO ☐ N/A	☑ YES ☐ NO ☐ N/A
Comment:		

Qualified Facilities Checklist

Appendix A: Qualified Facility Plan Requirements

Complete this Appendix only if the facility is a "qualified facility" as defined in §112.3(g). A qualified facility's Plan, whether certified by a PE or self-certified, must comply with all of the applicable requirements of §112.7 and subparts B and C of 40 CFR Part 112 referenced earlier in this checklist.

SPCC Inspection #: FY-INSP-090178

112.6-Qualified Facility Plan Requirements	Yes	No	N/A
(a) Did the owner/operator of the qualified facility self-certify the SPCC Plan?			х
If NO , see requirements for 112.3(d) above. If YES , did the owner/operator certify in the Plan that:			
(1) He or she is familiar with the requirements of 40 CFR part 112.			Х
(2) He or she has visited and examined the facility.			Х
(3) The Plan has been prepared in accordance with accepted and sound industry practices and standards.			х
(4) Procedures for required inspections and testing have been established.			Х
(5) The Plan is being fully implemented.			Х
(6) The facility meets the qualification criteria set forth under §112.3 (g).			Х
(7) The Plan does not deviate from any requirements as allowed by §112.7(a)(2) and 112.7(d), except as described under §112.6(c).			х
(8) Management has given full approval of the Plan and necessary resources have been committed for the Plan's full implementation.			х
(b) Did the owner/operator self-certify any of the Plan's technical amendments?			Х
If YES : Is the certification of any technical amendments in accordance with the provisions above (§112.6(a))?			х
(c)(1) and (d)(1) Environmental Equivalence. For each alternative measure allowed under $\S112.7(a)(2)$, the Plan is accompanied by a written statement by a PE that states the reason for nonconformance and describes the alternative method and how it provides equivalent environmental protection in accordance with $\S112.7(a)(2)$.			х
(c)(2) and (d)(1) Impracticability. For each determination of impracticability of secondary containment pursuant to §112.7(d), the Plan clearly explains why secondary containment measures are not practicable at this facility and provides the alternative measures required in §112.7(d) in lieu of secondary containment.			x
(c)(3) Security. The Plan contains one of the following: (i) The Plan complies with requirements under §112.7(g), OR			х
(ii) The Plan complies with the requirements under §112.6(c)(3)(ii): Plan describes how the owner/operator secures and controls access to the oil handling, processing and storage areas; secures master flow and drain valves; prevents unauthorized access to starter controls on oil pumps; secures out-of-service and loading/unloading connections of oil pipelines; addresses the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.			
 (c)(4) Bulk Storage Containers. The Plan contains one of the following: The Plan complies with the requirements under §§112.8(c)(6) or 112.12(c)(6), as applicable; OR The Plan complies with the requirements under §112.6(c)(4)(ii): Aboveground containers, supports and foundations tested for integrity on a regular schedule and whenever repairs are made. Appropriate qualifications for personnel performing tests and inspections have been determined in accordance with industry standards. The frequency and type of testing and inspections have been determined in accordance with industry standards, taking into account container size, configuration and design. Container supports and foundations regularly inspected Outside of containers frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas 			X

 Records of inspections and tests maintained 	
(d) Did a PE certify a portion of a qualified facility's self-certified Plan? If YES, the PE must certify in the Plan that:	Х
 (d)(2) (i) He/she is familiar with the requirements of 40 CFR Part 112. (ii) He/she or a representative agent has visited and examined the facility. (iii) The alternative method of environmental equivalence in accordance with §112.7(a)(2) or the determination of impracticability and alternative measures in accordance with §112.7(d) is consistent with good engineering practice, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112. 	X
(b)(1) If a PE certified a portion of the Plan, did a PE certify any technical amendments that affect this portion of the Plan?	Х
Comments:	

Appendix B: Container Inspection Form			
Container ID: <u>1450</u>	SPCC	C Inspection #: FY-INSP-090182	
Maximum capacity (gal): <u>1,273,734</u>	Container height (ft): 48		
Nominal capacity (gal):	Container diameter (ft): 33	Year Built: <u>1978</u>	
Current Status: Active Standby	☐ Out of service ☐ Closed		
Material(s) Stored in Container:			
☐ Crude oil ☐ Gasoline ☐ I	Diesel	☐ Vegetable oil/animal fats, grease	
Other:			
Container Type:	_	_	
∇ertical Cylindrical	External Floating Roof	Geodesic Dome	
Fixed Roof (Vented)		Spheroid	
☐ Coned Roof – (Vented)	☐ Hemispheroid (Noded)	☐ Horizontal Cylindrical	
☐ Coned Roof – (Not Vented)	☐ Hemispheriod (Not Noded)	Other:	
Container Material:			
⊠ Single Wall Steel	□ Not Painted	☐ Wooden	
☐ Double Wall Steel	☐ Fiberglass Reinforced Plastic	Other:	
☑ Painted	☐ Composite (steel with fiberglass)		
Container Construction: Welded	H ☐ Riveted ☐ Bolted ☐	Shop Fabricated	
Container Cathodic Protection:	None Sacrificial Anode(s)		
Inspect container including the base for	r leaks, specifically looking for:		
Drips, weeps, & stains:	Discoloration of tank:	Corrosion:	
☐ Check if present and check if:	☐ Check if present and check if:	☐ Check if present and check if:	
Acceptable	Acceptable	Acceptable	
Or, if Unacceptable □,	Or, if Unacceptable,	Or, if Unacceptable □,	
☐ Adequate			
Comment on container inspection:		Z / nacquate	
Comment on container inspection.			
Container Foundation Material:			
Earthen Material Ring Wall impermeable mat.)		t.) Concrete (w/o	
Steel Unknown Other:			
Inspect container foundation, specifica	ally looking for:		
Cracks:	Settling:	Gaps (between tank and	
Check if present and check if:	Check if present and check if:	foundation):	
Acceptable	Acceptable	Check if present and check if:	
· <u> </u>	· <u> </u>	Acceptable	
Or, if Unacceptable ☐,	Or, if Unacceptable ☐,	Or, if Unacceptable □,	
☑ Adequate			

Comment on foundation inspection:				
Container Piping Construction:				
	erground Steel (ba	are) 🛚 🖂 Stee	el (painted)	Steel (galvanized)
☐ Double walled ☐ Copp	er 🗌 Fiberglas	ss reinforced plastic		Unknown
Other:				
Inspect pipes/valves, specifically loc	oking for:			
Leaks at joints, seams, valves:	Discoloration:		Corrosio	on:
☐ Check if present and if:	☐ Check if prese	ent and if:	☐ Chec	ck if present and if:
Acceptable	Accepta	able 🗌		Acceptable
Or, if Unacceptable ☐,	Or, if Unacce	eptable ,	Or,	if Unacceptable ,
				juate
Bowing of pipe:	_Pooling of store	ed material:		
☐ Check if present and if:	☐ Check if prese	ent and if:		
Acceptable	Accepta	able 🗌		
Or, if Unacceptable ☐,	Or, if Unacce	eptable ,		
□ Adequate				
Comment on piping/valve inspection:				
Secondary Containment Types:				
□ Dikes/berms/retaining walls	☐ Curbing	☐ Culverts and	or gutters/	☐ Spill diversion ponds
☐ Sorbent Materials	☐ Retention Ponds	☐ Weirs and/or	booms	
Other – Loc.:				
Secondary Containment Checklist:				
☐ Capacity does not appear to be add	equate?	Drainage me	chanism man	ually operated?
☐ Not sufficiently impervious to stored	d material?	☐ Presence of	stored materia	al within dike or berm?
☐ Standing water within dike or berm	?	☐ Debris/veget	ation within or	on the dike or berm area?
☐ Erosion or corrosion of dike or berr Location:				
Comment on containment inspection:				

Appendix B: Container Inspection Form			
Container ID: <u>538</u>	SPCC	C Inspection #: FY-INSP-090178	
Maximum capacity (gal): <u>427,308</u>	Container height (ft): 40		
Nominal capacity (gal): <u>427,308</u>	Container diameter (ft): 42	Year Built: <u>1954</u>	
Current Status: Active Standby	Out of service Closed		
Material(s) Stored in Container:			
	Diesel	☐ Vegetable oil/animal fats, grease	
Other:			
Container Type:	_		
∀ Vertical Cylindrical	External Floating Roof	Geodesic Dome	
Fixed Roof (Vented)	Internal Floating Roof	Spheroid	
☐ Coned Roof – (Vented)	☐ Hemispheroid (Noded)	☐ Horizontal Cylindrical	
☐ Coned Roof – (Not Vented)	Hemispheriod (Not Noded)	Other:	
Container Material:			
Single Wall Steel	□ Not Painted	☐ Wooden	
☐ Double Wall Steel	☐ Fiberglass Reinforced Plastic	Other:	
□ Painted	☐ Composite (steel with fiberglass)		
Container Construction: Welded	☐ Riveted ☐ Bolted ☐	Shop Fabricated	
Container Cathodic Protection:	None Sacrificial Anode(s)		
Inspect container including the base for	leaks, specifically looking for:		
Drips, weeps, & stains:	Discoloration of tank:	Corrosion:	
☐ Check if present and check if:	☐ Check if present and check if:	☐ Check if present and check if:	
Acceptable	Acceptable	Acceptable	
Or, if Unacceptable □,	Or, if Unacceptable □,	Or, if Unacceptable □,	
		☐ Adequate	
·			
Comment on container inspection:			
Container Foundation Material:			
☐ Earthen Material ☐ Ring Wall impermeable mat.)	☐ Concrete (w/impermeable mat.	.) Concrete (w/o	
☐ Steel ☐ Unknown Other:			
Inspect container foundation, specifica	lly looking for:		
Cracks:	Settling:	Gaps (between tank and	
☐ Check if present and check if:	☐ Check if present and check if:	foundation):	
Acceptable	Acceptable	☐ Check if present and check if:	
Or, if Unacceptable □,	Or , if Unacceptable □,	Acceptable	
✓ Adequate		Or, if Unacceptable ,	
<u> </u>	<u>ka</u>		

Comment on foundation inspection	on:				
Container Piping Construction	1:				
	Underground	☐ Steel (ba	are)	Steel (painted)	☐ Steel (galvanized)
☐ Double walled ☐	Copper	☐ Fiberglas	ss reinforced pla	astic	Unknown
Other:					
Inspect pipes/valves, specifical	lly looking for	:			
Leaks at joints, seams, valves: Check if present and if: Acceptable Or, if Unacceptable Adequate		Discoloration: Check if present Accepta Or, if Unacce Adequate	able 🗌	Or	ion: eck if present and if: Acceptable □ r, if Unacceptable □, equate
Bowing of pipe: Check if present and if: Acceptable Or, if Unacceptable Adequate		Pooling of store ☐ Check if prese Accepta Or, if Unacce ☑ Adequate	ent and if: able		
Comment on piping/valve inspect	ion:				
Secondary Containment Types Dikes/berms/retaining walls		Curbing	☐ Culverts	and/or gutters	Spill diversion ponds
☐ Sorbent Materials	□ F	Retention Ponds	☐ Weirs ar	nd/or booms	
Other – Loc.:					
Secondary Containment Check Capacity does not appear to be Not sufficiently impervious to Standing water within dike or Erosion or corrosion of dike of Location:	be adequate? stored material berm? or berm?		Presenc	e of stored mater	nually operated? rial within dike or berm? or on the dike or berm area?
Comment on containment inspec	tion:				

Not Applicable SPCC CONTINGENCY PLAN REVIEW CHECKLIST

Appendix C: 40 CFR Part 109–Criteria for State, Local and Regional Oil Removal Contingency Plans

If a facility makes an impracticability determination for secondary containment in accordance with §112.7(d), it is required to provide an oil spill contingency plan following 40 CFR, part 109. Items below must be addressed in the Plan and implemented at the facility.

SPCC Inspection #: FY-INSP-090178

109.5–Development and implementation criteria for State, local and regional oil removal contingency plans*	Yes	No
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.		
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including:		
(1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges.		
(2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered.		
(3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP).		
(4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority.		
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including:		
(1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally.		
(2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated.		
(3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge.		
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including:		
(1) Specification of an oil discharge response operating team consisting of trained, prepared and available operating personnel.		
(2) Pre-designation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans.		
(3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations.		
(4) Provisions for varying degrees of response effort depending on the severity of the oil discharge.		
(5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses.		
(e) Specific and well defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances.		

Not Applicable

Environmental Equivalence (EE) Checklist

Appendix D: Environmental Equivalence Requirements

Complete this Appendix only if the facility has declared "environmental equivalence" measures as described in § 112.7(a)(2). Facility owners and operators have the flexibility to deviate from specific rule provisions if the Plan states the reason for nonconformance and if equivalent environmental protection is provided by some other means of SPCC. EE declarations must be certified by a PE. For EE declarations, see portions of checklist referenced earlier.

SPCC Citation:	SPCC Inspection #: FY-IN			
Is there written documentation validating/explaining rational for non-conformance with the SPCC requirements?		YES NO		
Is there written documentation outlining/detailing how the alternative method achieves environmental equivalence? and ,		☐ YES ☐ NO		
Is the alternative method:				
Technically feasible?		YES NO		
Logistically sound?		YES NO		
Practicable?		YES NO		
Name of Professional Engineer:				
Other PE certification requirements:				
Did a PE certify a portion of a qualified facility's self-certified Plan? ☐ YES ☐ NO				
Description of environmental equivalence:				
Inspector Comment:				

^{*} Use additional Appendix D forms for multiple Environmental Equivalent declarations.